

1 *[Submitting Counsel Listed on Signature Page]*

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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **OAKLAND DIVISION**

11 IN RE: SOCIAL MEDIA ADOLESCENT
12 ADDICTION/PERSONAL INJURY
13 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

14 This Document Relates To:

15 ALL ACTIONS

16 **STIPULATION REGARDING**
17 **DEPOSITION SCHEDULING FOR**
18 **TIKTOK DEFENDANTS**

19 The PI/SD Plaintiffs (“Plaintiffs”) and Defendants TikTok Ltd., TikTok LLC, TikTok Inc.,
20 ByteDance Ltd., and ByteDance Inc. (collectively referred to herein as “TikTok Defendants”)
21 (collectively, “the Parties”) respectfully submit this stipulation concerning an agreed upon
22 extension of time to depose the TikTok Defendants’ witnesses:

23 Whereas, on February 4, 2025, the TikTok Defendants informed Plaintiffs that a vendor had
24 made processing errors implicating approximately 100,000 Lark chat messages, resulting in the
25 TikTok Defendants’ need to reproduce or produce new Lark chat messages;

26 Whereas, the TikTok Defendants have completed those productions;

27 Whereas, in an effort to work collaboratively with Plaintiffs, the TikTok Defendants have
28 agreed to allow Plaintiffs to depose fact and 30(b)(6) witnesses of the TikTok Defendants not
already deposed through May 30, 2025, to the extent necessary. The parties will continue to work
together collaboratively on deposition scheduling.

Whereas, the parties will not use depositions of the TikTok Defendants' witnesses occurring outside the close of fact discovery due to the reproductions or productions of Lark messages to argue for a change in the case schedule, including the April 4, 2025 deadline to complete all other discovery as to the TikTok Defendants, the deadlines for expert discovery in the MDL and JCCP, or the trial date in the JCCP.

IT IS SO STIPULATED, through Counsel of Record.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

HONORABLE PETER H. KANG
UNITED STATES MAGISTRATE JUDGE

Dated: March 10, 2025

Respectfully submitted,

By: /s/ Michael M. Weinkowitz

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ATTESTATION

I, Geoffrey M. Drake, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: March 10, 2025

By: /s/ Geoffrey M. Drake
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